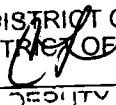


FILED**UNITED STATES DISTRICT COURT**

for the

OCT 30 2023

Western District of Texas

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERK

United States of America)

v.)

Santiago Ramirez)

Case No. DR-23-2985mdl)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 30, 2023 in the county of Maverick in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 933


It shall be unlawful for any person to ship, transport, transfer, cause to be transported, or otherwise dispose of any firearm to another person in or otherwise affecting commerce, if such person knows or has reasonable cause to believe that the use, carrying, or possession of a firearm by the recipient would constitute a felony as defined in section 932(a) or attempt or conspire to commit the conduct.

18 U.S.C. 554

Smuggling of goods from the United States.

This criminal complaint is based on these facts:

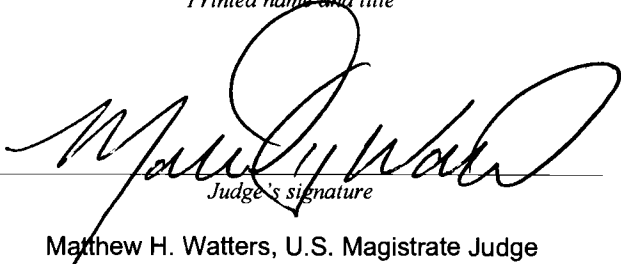
On October 30, 2023, Santiago RAMIREZ, was intercepted at the Eagle Pass, Texas Port of Entry attempting to illegally export and traffick approx. 189 firearms. Firearms were concealed in a non factory compartment within RAMIREZ' enclosed box trailer. During a Post Miranda interview, RAMIREZ freely admitted to trafficking firearms to the country of Mexico on two other occasions prior to this encounter.

☒ Continued on the attached sheet.
Complainant's signature

Darren Johnson, ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/30/2023
Judge's signatureCity and state: Del Rio, Texas

Matthew H. Watters, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On October 30, 2023, at approximately 1:30 A.M. United States Customs and Border Protection (CBP) Officers working outbound operations at the Eagle Pass, Texas Port of Entry, Bridge 2, encountered a black Dodge Ram 1500 pickup truck with Alabama License Plates, hauling a white box (enclosed) trailer also containing an Alabama License Plate. CBP Officers later identified the driver as Santiago Ramirez (hereinafter RAMIREZ). CBP Officers instructed RAMIREZ to proceed to secondary inspection for CBP Officers to inspect the Dodge Ram and box trailer.

CBP Officers inspected the trailer and noted that the wall inside the box trailer had been tampered with. CBP Officers X-rayed the box trailer and found what appeared to be firearms inside the back wall of the trailer. CBP Officers searched the wall and found approximately one hundred and eighty-nine (189) firearms wrapped in cellophane.

CBP Officers contacted the Bureau of Alcohol, Tobacco, and Firearms (ATF) Special Agent Darren Johnson and informed him of the firearms found inside the box trailer. ATF SA Johnson and ATF Task Force Officer Erendira Vivanco interviewed RAMIREZ at the Eagle Pass, Texas Port of Entry, Bridge 2.

After advisement of Miranda Rights and Waiver, RAMIREZ told ATF that he had been trafficking firearms for a male subject known to him as "El Tio." RAMIREZ stated that he met "El Tio" in Oaxaca, Mexico, and was offered \$6,000.00 United States Dollars each time he trafficked firearms from the United States to Mexico. RAMIREZ stated that he would transport the box trailer from Oaxaca, Mexico, cross into the United States from the Eagle Pass, Texas Port of Entry, and drop off the box trailer in Dallas, Texas.

RAMIREZ stated that he would leave the box trailer with persons unknown to RAMIREZ at a Super Market parking lot in Dallas, Texas. RAMIREZ stated that the persons would load the box trailer with firearms, conceal the firearms inside a false wall, and then return the box trailer with the firearms to RAMIREZ at the Super Market. RAMIREZ stated that he would transport the box trailer back to Oaxaca, Mexico and then transfer the box trailer with the concealed firearms over to "El Tio."

RAMIREZ stated that he trafficked firearms for "El Tio" two times before. RAMIREZ stated that on this current firearm trafficking attempt, he (RAMIREZ) purchased ten (10) of the firearms that were found inside the box trailer. RAMIREZ stated that "El Tio" instructed him to purchase the 10 firearms in Dallas, Texas and sent a male subject to give RAMIREZ the money to purchase the firearms. RAMIREZ stated that he purchased four .22 caliber rifles on Tuesday, in Dallas, Texas for \$2000.00 from a male subject at a gas station. RAMIREZ also stated that he purchased the additional six, .22 caliber rifles from another male subject at a gas station in Dallas, Texas for \$3000.00.

RAMIREZ stated that he did not have a license to export firearms from the United States into Mexico. RAMIREZ stated that he knows "El Tio" cannot legally purchase firearms in the United States. RAMIREZ stated that he knows it is illegal to traffic firearms into Mexico. RAMIREZ further stated that the manufacture for a few of the .22 caliber rifles he purchased in Dallas, Texas was "Marlin."

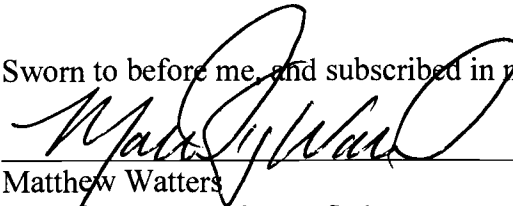
Preliminary examination of the one hundred and eighty nine firearms determined that the firearms were all manufactured outside the state of Texas, and therefore affecting interstate commerce.



October 30, 2023

Darren Johnson
Special Agent
Alcohol Tobacco Firearms

Sworn to before me, and subscribed in my presence,



Matthew Watters
United States Magistrate Judge
Western District of Texas